

1
2
3
4
5
6
7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,
11 Plaintiff
12 v.
13 MICHAEL KAMCHEE,
14 Defendant.

15 NO. CR20-189 MAT
16 **CRIMINAL INFORMATION**
17 **Misdemeanor:** 18 U.S.C. § 641

18 The United States Attorney charges that:

19 **Count One**

20 (**Theft of Government Property**)

21 On or about November 2, 2018, in King County, in the Western District of
22 Washington, the defendant, MICHAEL KAMCHEE, willfully and knowingly did steal
23 and purloin a Stihl TS-360 cutoff saw, which was the goods and property of the United
24 States.

25 All in violation of 18 U.S.C. § 641.

26 **ASSET FORFEITURE ALLEGATION**

27 The allegations contained in Count 1 of this Information are hereby realleged and
28 incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the
offense alleged in Count 1, the Defendant MICHAEL KAMCHEE shall forfeit to the

1 United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of
2 Title 28, United States Code, Section 2461(c), any property that constitutes or is traceable
3 to proceeds of the offense. This property includes, but is not limited to a sum of money
4 reflecting the proceeds the Defendant obtained from the offense.

5 **Substitute Assets.** If any of the property described above, as a result of any act or
6 omission of the Defendant,

- 7 a. cannot be located upon the exercise of due diligence;
- 8 b. has been transferred or sold to, or deposited with, a third party;
- 9 c. has been placed beyond the jurisdiction of the Court;
- 10 d. has been substantially diminished in value; or,
- 11 e. has been commingled with other property which cannot be divided without
12 difficulty;

13 //

14 //

15 //

16

17

18

19

20

21

22

23

24

25

26

27

28

1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to Title
3 21, United States Code, Section 853(p).

4 DATED this 4th day of November, 2020.
5
6

7 Sarah J. Vogel, for
8 BRIAN T. MORAN
9 United States Attorney

10 /s/S. Kate Vaughan
11 S. KATE VAUGHAN
12 Assistant United States Attorney

13 /s/Lyndsie R. Schmalz
14 LYNDSIE R. SCHMALZ
15 Assistant United States Attorney